

EXHIBIT E

10/3/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Ahmad Al-Dahle

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)
RICHARD KADREY, et al.,)
Plaintiff,)
vs.) C.A. NO.:
META PLATFORMS, INC.,) 3:23-cv-03417-VC
Defendant.)
)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF AHMAD AL-DAHLE

Palo Alto, California

Thursday, October 3, 2024

stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR
Realtime Systems Administrator
California CSR License #11600
Oregon CSR License #21-0005
Washington License #21009491
Nevada CCR License #980
Texas CSR License #10725

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 VIDEOTAPED DEPOSITION of AHMAD AL-DAHLE,
2 taken before Heather J. Bautista, CSR No. 11600, a
3 Certified Shorthand Reporter for the state of
4 California, with principal office in the county of
5 Santa Clara, commencing on Thursday, October 3,
6 2024, 9:35 a.m., at 3175 Hanover Street, Palo Alto,
7 California 94304.

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1 instance."

2 MR. GHAJAR: Opposed.

3 Q. (By Mr. Young) Mr. Al-Dahle, are you aware
4 of any members of the generative AI team expressing
5 concerns about using certain datasets because they
6 used, quote, "pirated material" in 2022?

7 MR. GHAJAR: Objection. Vague.

8 THE WITNESS: I'm not aware of such an
9 event.10 Also, I'll remind you that I took the role
11 in 2023, so I did not have oversight of generative
12 AI in 2022.13 Q. (By Mr. Young) Do you deny that members of
14 the generative AI team have expressed concerns about
15 using certain datasets?

16 MR. GHAJAR: Objection. Assumes facts.

17 THE WITNESS: That's a pretty vague
18 question. There's a lot of technical complexity
19 where people could have easily expressed concerns,
20 but I'm not personally aware of -- of those
21 examples.

22 MR. YOUNG: Okay. I think this might be a

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1 good time for lunch. 1:06? Yeah.

2 MR. GHAJAR: That's fine with me.

3 THE VIDEOGRAPHER: Okay. We are off the
4 record at 1:06.

5 (Lunch recess taken 1:06 p.m. to 1:58 p.m.)

6 THE VIDEOGRAPHER: We are now on the record
7 at 1:58.

8 Q. (By Mr. Young) Welcome back, Mr. Al-Dahle.

9 A. Thank you.

10 Q. Now, in your role at Meta there are only
11 two individuals above you, right?

12 MR. GHAJAR: Objection. Vague.

13 THE WITNESS: I report to Chris Cox who
14 reports to Mark.

15 Q. (By Mr. Young) So there are only two
16 individuals who are -- strike that.

17 So would it be fair to say that you're
18 fairly high up in the organizational structure of
19 Meta?

20 A. What do you mean by "high up"?

21 Q. Well, you report to Mr. Cox, who only
22 reports to Mr. Zuckerberg; is that correct?

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1 A. That's correct.

2 Q. And you have thousands of people who
3 report -- who report under you; is that right?

4 A. No, I don't think I have thousands. I
5 don't have the exact number that I have, but I would
6 estimate it's north of a thousand, but below two.

7 Q. Somewhere between 1,000 and 2,000 people?

8 A. I think that's -- that's my estimate, yeah.

9 Q. Mr. Al-Dahle, do you recall how much money
10 Meta invested in its generative AI projects last
11 year?

12 A. I don't know that offhand.

13 Q. Hundreds of millions?

14 A. Possible.

15 Q. Mr. Al-Dahle, can you give me a rough
16 overview about your job responsibilities at Meta.

17 A. Yeah. I'm what they call a product group
18 lead. So my responsibility includes the development
19 of the roadmap for generative AI at the company, and
20 the execution.

21 Q. And are you well-compensated for your work
22 at Meta?

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1 I, HEATHER J. BAUTISTA, CSR No. 11600,
2 Certified Shorthand Reporter, certify:
3 That the foregoing proceedings were taken
4 before me at the time and place therein set forth,
5 at which time the witness declared under penalty of
6 perjury; that the testimony of the witness and all
7 objections made at the time of the examination were
8 recorded stenographically by me and were thereafter
9 transcribed under my direction and supervision; that
10 the foregoing is a full, true, and correct
11 transcript of my shorthand notes so taken and of the
12 testimony so given;

13 (XX) Reading and signing was not requested/offered.

14 I further certify that I am not financially
15 interested in the action, and I am not a relative or
16 employee of any attorney of the parties, nor of any
17 of the parties.

18 I declare under penalty of perjury under the
laws of California that the foregoing is true and
19 correct. Dated: October 4, 2024

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HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR